

BONNETT, FAIRBOURN, FRIEDMAN
& BALINT, P.C.
Andrew S. Friedman (admitted *pro hac vice*)
Wendy J. Harrison (CA SBN 151090)
2901 North Central Avenue, Suite 1000
Phoenix, Arizona 85012
Tel: (602) 274-1100
Fax: (602) 274-1199
E-mail: afriedman@bffb.com
wharrison@bffb.com

RODDY KLEIN & RYAN
Gary Klein (admitted *pro hac vice*)
Shennan Kavanagh
727 Atlantic Avenue
Boston, MA 02111-02810
Telephone: 617-357-5500, ext. 15
Facsimile: 617-357-5030
E-mail: klein@roddykleinryan.com
kavanagh@roddykleinryan.com

Co-Lead Interim Class Counsel

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

In re: WELLS FARGO MORTGAGE
LENDING PRACTICES LITIGATION

) M:08-CV-01930-MMC
)
)

This document relates to
ALL ACTIONS

)
) **STIPULATION TO EXTEND**
) **DEADLINE FOR PLAINTIFFS'**
) **DISCOVERY RESPONSES**
)

) Honorable Maxine M. Chesney
)
)
)

1 WHEREAS, Defendant has served Plaintiffs with the following written discovery
2 requests (collectively the "Discovery Requests"):

- 3 1. Defendants Wells Fargo Bank, N.A.'s Interrogatories to Plaintiffs (Set One)
- 4 2. Defendant Wells Fargo Bank N.A.'s Requests for Admissions (Set One);
- 5 and
- 6 3. Defendant Wells Fargo Bank N.A.'s Requests for Production of Documents
- 7 (Set One).

8 WHEREAS, the parties have agreed to proceed to mediation before the Hon.
9 Ronald M. Sabraw (Ret.) of JAMS, who has scheduled an initial mediation session to
10 take place on August 28, 2008;

11 WHEREAS, Plaintiffs have requested, and Defendant has agreed to, an extension
12 of the deadlines for Plaintiffs to respond to the Discovery Requests to avoid the
13 unnecessary expenditure of time and resources during the pendency of the mediation.

14 NOW, THEREFORE, the parties stipulate and respectfully request the Court to
15 extend the deadlines for Plaintiffs to respond to the Discovery Requests to a date three (3)
16 weeks after Defendant provides written notice to Co-Lead Interim Class Counsel that it
17 considers the private mediation to be concluded, without success, unless the parties
18 otherwise agree in writing.

19 DATED this 21st day of August, 2008.

20 BONNETT, FAIRBOURN, FRIEDMAN, &
21 BALINT, P.C.

22 /s/Andrew S. Friedman

23 Andrew S. Friedman

24 Wendy J. Harrison

25 2901 North Central Avenue, Suite 1000
26 Phoenix, Arizona 85012
27
28

1 RODDY KLEIN & RYAN

2 /s/Gary Klein

3 Gary Klein

4 Shennan Kavanagh

727 Atlantic Avenue

5 Boston, MA 02111-02810

(617) 357-5500 ext. 15

6 Co-Lead Interim Class Counsel

8 REED SMITH LLP

9 /s/Robert D. Phillips, Jr.

10 Robert D. Phillips, Jr.

11 Tyree P. Jones, Jr.

David S. Reidy

12 P. O. Box 7936

San Francisco, CA 94120-7936

13 Telephone: (415) 543-8700

14 Facsimile: (415) 391-8269

15 Attorneys for Defendant

16 Wells Fargo Bank, N.A.

CERTIFICATE OF SERVICE

I, Andrew S. Friedman, hereby certify that a true copy of the foregoing document filed through the ECF system will be electronically sent to the registered participants as identified on the Notice of Electronic Filing, and paper copies will be sent to those indicated as non-registered participants on August 21, 2008.

/s/ Andrew S. Friedman
Andrew S. Friedman

